

**From:** [Ralph Knode](#)  
**To:** [Shea, Valois](#)  
**Subject:** comments on the Draft Dewey-Burdock Class III UIC Permit  
**Date:** Monday, June 19, 2017 2:56:16 PM  
**Attachments:** [image001.png](#)  
[comments on Dewey Burdock UIC draft area permit.pdf](#)

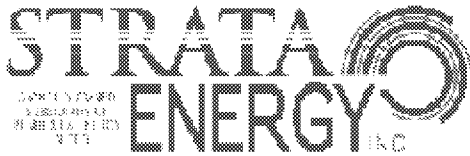
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Dear Ms. Shea,

Attached please find comments from Strata Energy on the Draft Dewey-Burdock Class III Area Permit.

Regards,

Ralph Knode CEO  
Strata Energy, Inc.  
PO Box 38  
Sundance, WY 82729  
W 307-467-5995  
C 303-249-4933  
[ralph@stratawyo.com](mailto:ralph@stratawyo.com)





Ross ISR Uranium Mine  
2929 New Haven Road  
Oshoto, WY 82721  
(307) 467-5995

July 19, 2017

Valois Shea  
U. S. Environmental Protection Agency  
Underground Injection Control Program, 8WP-SUI  
1595 Wynkoop Street  
Denver, CO 80202-1129

Re: Comments on Dewey-Burdock Draft Class III Area Permit

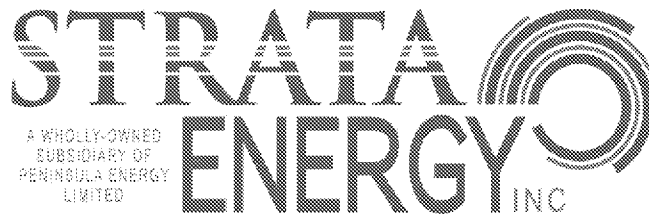
Dear Ms. Shea,

This letter provides comments by Strata Energy, Inc. (Strata) to the Dewey-Burdock Draft Class III Area Permit. Strata Energy is the operator of the Ross Uranium ISR Project in Crook County, Wyoming.

Strata is concerned the Draft Class III Area Permit includes many unprecedented requirements that are not included in Class III permits for any other ISR facilities within the U.S. These include post-restoration groundwater monitoring requirements, column testing requirements and additional excursion monitoring and corrective action requirements.

Groundwater restoration and excursion monitoring requirements at other ISR operations are imposed by the US Nuclear Regulatory Commission (NRC) or governing Agreement State and are sufficient to ensure that there will be no impacts to groundwater quality outside of the exempted aquifer that would affect the usability of the non-exempt waters. The requirements are prime examples of regulatory duplication of existing NRC license conditions.

The various unprecedented requirements in the Draft Area Permit are nothing more than a thinly veiled attempt to impose the previously proposed, but never approved 40 CFR Part 192 rulemaking. The Region 8 office is attempting to apply similar standards to those included in a proposed rule issued by the EPA in January 2017 – Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings. However, as you know, that rulemaking is not finalized. EPA must evaluate projects based on the existing statute, regulations, and long-standing guidance.



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I urge Region 8 to re-evaluate its proposed requirements to ensure they are scientifically justified and in line with the existing rules and regulations.

Sincerely,

A handwritten signature in black ink that reads "Ralph Knode". The signature is written in a cursive, flowing style.

Ralph Knode, CEO  
Strata Energy, Inc.